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December 29, 2021

The Honorable John P. Cronan  
United States District Court Judge  
USDC SDNY  
500 Pearl Street, Room 2230  
New York, NY 10007

RE: Benteler Automotive  
V. Kuehne + Nagel, Inc.,  
d/b/a Blue Anchor  
21-cv-08622(JPC) (GWG)

Dear Judge Cronan:

I write to provide a status of the captioned litigation pursuant to the Court's Order of December 27, 2021.

On October 25, 2021 this office filed an Amended Complaint, dkt. # 3 and on October 27, 2021 filed a Request for Issuance of Summons dkt.#6, on October 28, 2021 an Electronic Summons was issued dkt. # 8.

On November 3, 2021 this office by email forwarded the Amended Complaint, Summons and Waiver of Service request to Ms. Wanda Sanchez of Nacora Insurance & Claims Service Center a representative of Kuehne + Nagel d/b/a Blue Anchor America Line. We requested that she or someone else sign and return the waiver. In addition I engaged Ms. Sanchez in a discussion to possibly settle the matter. On November 16, 2021 Ms. Sanchez proposed a counter offer regarding settlement which I advised I needed to forward to my client. It took some time for my client to respond. In early December it became clear that there were some complicating issues which needed to be discussed.

During the week of December 13<sup>th</sup> I called Ms. Sanchez to discuss this matter including the waiver of service, leaving a voice mail on 2 occasions. On December 17 I wrote to Ms. Sanchez and learned by auto reply that Ms. Sanchez had been out of her office since December 14<sup>th</sup> and that she would not return until December 27<sup>th</sup>.

On December 28<sup>th</sup> I spoke with Ms. Sanchez, she advised me that the waiver would be signed by the start of the week of January 3<sup>rd</sup> and that she would provide me with the present status with respect to the complicating issues which interrupted our prior settlement discussions.

In consideration of the foregoing we request that the Court reschedule the January 3<sup>rd</sup> conference date to February

This request is granted. The IPTC scheduled for January 3, 2022, at 11:00 a.m. is adjourned until February 3, 2022, at 10:30 a.m.

SO ORDERED.

Date: December 30, 2021  
New York, New York



JOHN P. CRONAN  
United States District Court

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